

FILED

AUG - 9 2022

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY _____ DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

VS.

MICHAEL ANTHONY FLYNN,

Defendant.

CRIMINAL NO. SA 22 CR 0398
INFORMATION

F B

**Ct. 1: 18 U.S.C. §§ 922(a)(1)(A) & 2
Aiding and Abetting Engaging in the
Firearms Business Without a License**

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

[18 U.S.C. §§ 922(a)(1)(A) & 2]

From on or about October 10, 2019, to on or about February 22, 2022, in the Western District of Texas, Defendant,

MICHAEL ANTHONY FLYNN,

did knowingly and unlawfully aid and abet T.S.S., an individual not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, in the willful engagement in the business of dealing in firearms, all in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), 924(a)(1)(D), and 2.

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE

[See Fed. R. Crim. P. 32.2]

I.

Firearms Violations and Forfeiture Statutes

[Title 18 U.S.C. §§ 922(a)(1)(A) , subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461]

As a result of the criminal violations set forth in Count One, the United States of America gives notice to the Defendant **MICHAEL ANTHONY FLYNN** of its intent to seek the forfeiture

of the properties described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461, which states:

Title 18 U.S.C. § 924. Penalties

(d)(1) Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (a) . . . of section 922 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . .

This Notice of Demand for Forfeiture includes but is not limited to the following properties described below:

II.
Money Judgment

A sum of money, equal to **One Hundred Thirty One Thousand Seven Dollars and 30 Cents (\$131,007.30)**, which represents the value of the properties involved in the violation set forth above that were not recovered/seized by the government, for which **MICHAEL ANTHONY FLYNN** is individually liable.

Substitute Assets

If any of the above described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture, pursuant to Title 21 U.S.C. § 853(p), of any other property (substitute assets) of said Defendant up to the value of the forfeitable property.

ASHLEY C. HOFF
UNITED STATES ATTORNEY

BY:


MATTHEW W. KINSKEY
Assistant United States Attorney

BY:


WILLIAM F. CALVE
Assistant United States Attorney